

EXHIBIT D

INDEX IN SUPPORT OF MOTION TO SEAL SAVEONSP'S MOTION TO COMPEL JJHCS TO RUN
SEARCHES OF THE CUSTODIAL FILES OF MICHAEL INGHAM (ECF NOS. 488, 494 & 513)

Material/Title of Document		Basis for Sealing (Legitimate Private or Public Interests That Warrant the Relief)	Clearly Defined and Serious Injury That Would Result if Relief Were Not Granted	Why a Less Restrictive Alternative to the Relief Sought Is Not Available	Prior Order Sealing the Same Materials	Opposition to Sealing, if Any, and Basis
<u>Letter from E. Evans Wohlforth, Jr. to Judge Wolfson regarding SaveOnSP's Motion to Compel JJHCS to run searches of the custodial files of Michael Ingham, dated January 3, 2025 (ECF No. 488)</u>		JJHCS requests the redaction of information in and exhibits to the January 3 letter that is not known to the general public and which the parties agreed to keep confidential. JJHCS maintains that these documents and exhibits contain sensitive business information.	If filed on the public docket, these portions of the January 3 letter and certain of the exhibits thereto would reveal confidential material relating to JJHCS's sensitive business information. Disclosure to the public of this confidential and	JJHCS requests the sealing of only the information that will reveal confidential information that is not known to the general public. No less restrictive alternative is available or practicable.	None.	None
Pages 2–6 and notes 5-10, & 13	Redactions discussing confidential exhibits					

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Exhibit 1	Redactions to discovery letter discussing confidential documents		proprietary information would cause irreparable harm to JJHCS because it would place JJHCS at a competitive disadvantage if its competitors secured the information.			
Exhibit 2	Sealing of confidential organizational charts					
Exhibits 7, 8, 10- 25, 27-31, 33-38, & 40	Sealing of emails and attachments discussing confidential information					

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Exhibits 9, 26, 32, & 39	Sealing of draft studies and abstracts related to research on co- pay programs					
<u>Letter from Jeffrey J. Greenbaum to Judge Wolfson in opposition to SaveOnSP's Motion to Compel JJHCS to run searches of the custodial files of Michael Ingham, dated January 17, 2025 (ECF No. 494)</u>		JJHCS requests the redaction of information in and certain exhibits to the January 17 letter that is not known to the general public and which the parties agreed to keep confidential. JJHCS maintains that this letter and exhibits	If filed on the public docket, these portions of the January 17 letter and certain exhibits thereto would reveal confidential material relating to JJHCS's sensitive business information. Disclosure to the public of this confidential and	JJHCS requests the sealing of only the information that will reveal confidential information that is not known to the general public. No less restrictive alternative is available or practicable.	None, except for Exhibit 7, which was sealed per ECF No. 448	None
Pages 3-11 and notes 1 & 2	Redactions discussing confidential exhibits					

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Exhibit 4	Sealing of confidential presentation	contain sensitive business information.	proprietary information would cause irreparable harm to JJHCS because it would place JJHCS at a competitive disadvantage if its competitors secured the information.			
Exhibits 6 & 7	Redactions to discovery letters					
Exhibits 8-11	Sealing of emails and attachments discussing confidential information					

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<u>Letter from E. Evans Wohlforth, Jr. to Judge Wolfson in reply to SaveOnSP's Motion to Compel JJHCS to run searches of the custodial files of Michael Ingham, dated January 31, 2025 (ECF No. 513)</u>		JJHCS requests the redaction of information in and certain exhibits to the January 31 letter that is not known to the general public and which the parties agreed to keep confidential. JJHCS maintains that these documents and exhibits contain sensitive business information. In addition, Exhibit 47 consists of a document that was designated as Attorneys' Eyes Only by non-party Avalere.	If filed on the public docket, these portions of the January 31 letter and certain exhibits thereto would reveal confidential material relating to JJHCS's sensitive business information. Disclosure to the public of this confidential and proprietary information would cause irreparable harm to JJHCS because it would place JJHCS at a competitive	JJHCS requests the sealing of only the information that will reveal confidential information that is not known to the general public. No less restrictive alternative is available or practicable.	None	None
Pages 2–7 and notes 3 & 5	Redactions discussing confidential exhibits					
Exhibits 43, 44, & 46	Sealing of draft documents related to research on co- pay programs					

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Exhibits 45, 47-50	Sealing of emails discussing confidential information		disadvantage if its competitors secured the information.			